



Stamatis Stamoulis
stamoulis@swdelaw.com

VIA EMAIL

October 4, 2021

Reciprocity Industries, LLC
c/o Adam J. Tunning
Moulton Bellingham, PC
27 North 27th Street, Suite 1900
P.O. Box 2559
Billings, MT 59103-2559

Re: *In re Boy Scouts of America and Delaware BSA LLC (Del Bankr.20-10343)*

Century Indemnity Company (“Century”) served a document subpoena on you pursuant to Rule 45 of the Federal Rules of Civil Procedure. The purpose of this subpoena is to seek information that is highly relevant to confirmation of the Bankruptcy Plan of Reorganization (the “Plan”) in the above captioned matter. To date, you have failed to adequately respond to this subpoena, and your time to do so has passed. Further, you have set forth no good reasons for not doing so.

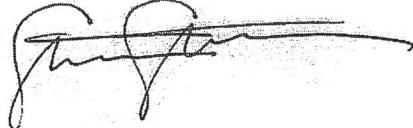
We request that you withdraw your objections and respond fully to each document request in the subpoena by Friday, October 8, 2021. Failure to fully comply will result in us moving the Delaware Bankruptcy Court to compel your full and complete compliance with the subpoena. Time is of the essence in this matter. The Plan is scheduled for confirmation hearings in January 2022, and the Plan Disclosure Statement has already been approved and has been sent out to potential Plan voters.

The information you possess is highly relevant to determining who is permitted to vote for the Plan. Moreover, any assertion that disclosure of such information is protected by the attorney-client privilege is unavailing. None of the materials requested in Century’s subpoena would qualify as a privileged communication. Century’s subpoena seeks factual information to which the privilege does not apply. Further, to the extent some of Century’s requests encompass privileged communications, any applicable privilege was clearly waived. Accordingly, the attorney-client privilege is not a legally valid basis for your refusal to adequately respond to the subpoena.

We reiterate our request that you withdraw your objections and commit to produce the requested material by Friday, October 11, 2021. We are generally available to meet and confer this week. Absent a commitment to fully comply with the subpoena issued by Century in this matter, we will move the Court to compel compliance.

Reciprocity Industries, LLC
October 4, 2021
Page 2

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Stamatios Stamoulis".

Stamatios Stamoulis
Counsel for Plaintiff